

## Ex. 5 Post-Contempt Hearing

<u>DATE</u>	<u>NARRATIVE</u>	<u>TIME-KEEPER</u>	<u>HOURS</u>	<u>RATE</u>	<u>VALUE</u>
5/2/2023	Drafting of initial outline of arguments for Post-Contempt Hearing Brief which will be finalized once the hearing transcripts are made available by the judge's court reporter	BCN	1.6	\$ 380.00	\$ 608.00
5/3/2023	Telephone conference with mediator re: mediator's fees and settlement agreement and proof at Contempt trial	BCN	0.3	\$ 380.00	\$ 114.00
5/10/2023	Review of available options under federal law to ask for finding of forgery committed by P&G and additional sanctions	BCN	0.6	\$ 380.00	\$ 228.00
5/11/2023	Email with client re: Day 3 of contempt trial, upcoming briefing and options for contempt/sanctions against P&G	BCN	0.6	\$ 380.00	\$ 228.00
5/15/2023	Initial drafting of fact section of post contempt hearing brief related to dismissal of Mike Clark's' claims	BCN	2.4	\$ 380.00	\$ 912.00
5/15/2023	Initial drafting of argument section of post contempt hearing brief related to dismissal of Mike Clark's' claims	BCN	3.1	\$ 380.00	\$ 1,178.00
5/17/2023	Addition of sanctions legal argument against P&G Construction Consultant in Post-Hearing Brief	BCN	1.9	\$ 380.00	\$ 722.00
5/17/2023	Addition of arguments in Post-Hearing Brief re: requesting sanctions in the form of attorneys fees award	BCN	0.7	\$ 380.00	\$ 266.00
5/17/2023	Addition of arguments in Post-Hearing Brief re: requesting sanctions in the form of barring expert testimony	BCN	1.9	\$ 380.00	\$ 722.00
5/17/2023	Addition of arguments in Post-Hearing Brief re: requesting sanctions in the form of barring entrance of P&G into action as party in interest	BCN	0.9	\$ 380.00	\$ 342.00
5/18/2023	Revisions to legal argument re: sanctions to be awarded against William Griffin and P&G	BCN	1.7	\$ 380.00	\$ 646.00
5/18/2023	Review of M. Clark 2nd deposition transcript re: testimony re: scope of assignment and efforts of William Griffin to assist him	BCN	0.7	\$ 380.00	\$ 266.00
5/18/2023	Revise post-contempt hearing memorandum to include analysis of request for negative inferences re P&G's continued failure to comply with Court Orders or produce requested discovery and only documents produced have been forged and/or manipulated.	KAH	1.4	\$ 275.00	\$ 385.00
5/18/2023	Conduct legal research re Court's authority to dismiss party and/or case for lack of standing	KAH	0.8	\$ 275.00	\$ 220.00
5/23/2023	2 emails with client re timely receipt of hearing transcripts from judge's court reporter, filing of memorandum of law	BCN	0.2	\$ 380.00	\$ 76.00
5/23/2023	Revisions to fact section of post-hearing memorandum of law based on transcript information	BCN	1.4	\$ 380.00	\$ 532.00
5/23/2023	Review 150 page transcript of day two of contempt hearing to determine testimony helpful to add to post-hearing brief re: Mr. Clark's testimony	BCN	0.9	\$ 380.00	\$ 342.00
5/23/2023	Addition of Billie Griffin and Mike Clark fact sections to post-hearing brief regarding relevant testimony and addition of cites re: same	BCN	1.0	\$ 380.00	\$ 380.00
5/24/2023	2 emails with client re: timely receipt of the trial transcripts as needed to have ability to file Post-Contempt Hearing Brief by deadline imposed by Judge	BCN	0.1	\$ 380.00	\$ 38.00
5/24/2023	Initial review of 40+ pages of contempt hearing testimony of Michael Clark to determine whether testimony is supportive of dismissal	BCN	0.4	\$ 380.00	\$ 152.00
5/24/2023	Initial review of 40+ pages of contempt hearing testimony of William Griffin to determine whether testimony is supportive of contempt finding	BCN	0.4	\$ 380.00	\$ 152.00
5/25/2023	Review of trial testimony of B. Griffin and inclusion of same with case citations into Post-Contempt Hearing brief	BCN	0.9	\$ 380.00	\$ 342.00

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5/25/2023	Review of trial testimony of R. Perkins and inclusion of same with case citations into Post-Contempt Hearing brief	BCN	0.7	\$ 380.00	\$ 266.00
5/25/2023	Review of trial testimony of T. Struttman's second testimony and inclusion of same with case citations into Post-Contempt Hearing brief	BCN	1.5	\$ 380.00	\$ 570.00
5/25/2023	2 emails with client and client re: Post-Contempt Hearing brief	BCN	0.2	\$ 380.00	\$ 76.00
5/25/2023	Review of trial testimony of W. Griffin and inclusion of same with case citations into Post-Contempt Hearing brief	BCN	2.9	\$ 380.00	\$ 1,102.00
5/25/2023	Review of trial testimony of T. Struttman's initial testimony and inclusion of same with case citations into Post-Contempt Hearing brief	BCN	1.9	\$ 380.00	\$ 722.00
5/25/2023	Additional revisions to sanctions argument section in post-hearing brief based on new facts added from the testimony of T. Struttman, W. Griffin, R. Perkins, and B. Griffin	BCN	1.2	\$ 380.00	\$ 456.00
5/26/2023	Revisions to post-hearing brief to address relief sought and alternative form of relief sought	BCN	1.4	\$ 380.00	\$ 532.00
5/26/2023	Update to hearing citations to T. Struttman testimony and M. Clark testimony in post-hearing brief	BCN	0.6	\$ 380.00	\$ 228.00
5/26/2023	Email to client re filing of Post-Contempt hearing brief, relief sought and upcoming deadlines	BCN	0.3	\$ 380.00	\$ 114.00
5/26/2023	Review of recent rulings against D. Berkley in Western District of Tennessee to learn if other cases dismissed, possible impact on case at issue	BCN	0.4	\$ 380.00	\$ 152.00
5/26/2023	Revise post-contempt hearing brief to include analysis that conflict of interest exists with opposing counsel representing both Plaintiff and third party P&G Construction Consultants, to argue that William Griffin should be precluded from offering expert testimony due to his financial interest in the litigation, and to include applicable case law supporting dismissal of Michael Clark for lack of standing/real party in interest	KAH	2.5	\$ 275.00	\$ 687.50
6/12/2023	Email to client re: opposing counsel's failure to timely response to Post-Contempt Hearing Brief	BCN	0.2	\$ 380.00	\$ 76.00
6/20/2023	Review of Plaintiff's (belated) Response to Post-Contempt Hearing Filings	BCN	0.3	\$ 380.00	\$ 114.00
6/20/2023	Email to client re: Plaintiff's belated response to Post-Contempt Hearing Brief and options under federal court rules to respond	BCN	0.2	\$ 380.00	\$ 76.00
6/20/2023	Initial drafting of Reply to Post-Contempt Hearing Response, including drafting of introduction	BCN	0.5	\$ 380.00	\$ 190.00

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6/20/2023	Review Plaintiff's Response to Ohio Security's Motion for Sanctions in order to continue drafting Reply to Plaintiff's Response.	KAH	0.4	\$ 275.00	\$ 110.00
6/22/2023	Drafting of introduction to Reply Brief in support of Contempt and Sanctions findings against P&G	BCN	0.8	\$ 380.00	\$ 304.00
6/23/2023	Review of what appears to be an altered email produced by P&G Construction Consultants related to November 23, 2020 email and comparison with other proof	BCN	1.4	\$ 380.00	\$ 532.00
6/23/2023	Initial drafting of Post-Contempt Hearing Reply Brief to address P&G's produced, different email	BCN	0.7	\$ 380.00	\$ 266.00
6/23/2023	2 emails with client re: new ruling by Judge Anderson, its impact on this case, and Plaintiff's missing proof	BCN	0.4	\$ 380.00	\$ 152.00
6/23/2023	Review 600+ page claim file for any document supporting Plaintiff's argument that William Griffin gave Ohio Security prior notice of the assignment of claim	BCN	1.5	\$ 380.00	\$ 570.00
6/24/2023	Drafting of legal argument in Post-Contempt Hearing Reply Brief re: distinction between real-party-in-interest and Article III standing analysis	BCN	1.5	\$ 380.00	\$ 570.00
6/25/2023	Read Cranpark v. Rogers Group Inc. cited by Plaintiff's counsel in Response to Post Contempt Hearing Brief in support of argument that Plaintiff has standing to pursue case, in preparation for rebutting in Reply.	KAH	0.9	\$ 275.00	\$ 247.50
6/26/2023	Revisions to Post-Contempt Hearing Reply Brief to address client email from November 23, 2020 and William Griffin's changes to same	BCN	1.5	\$ 380.00	\$ 570.00
6/26/2023	Revisions to Post-Contempt Hearing Reply Brief to address nuances of Cranpark decision and repeat request to dismiss Michael Clark's claims with prejudice	BCN	2.3	\$ 380.00	\$ 874.00
6/26/2023	Final revisions to Post-Contempt Hearing Reply Brief to shorten to 7-page limitation found in local rules and believed to be applicable to this matter	BCN	1.0	\$ 380.00	\$ 380.00
6/26/2023	Telephone conference with client re options to address facts in Post-Contempt Hearing Reply Brief	BCN	0.2	\$ 380.00	\$ 76.00
6/26/2023	Revise Reply to Plaintiff's Response to Post-Hearing Contempt Brief.	KAH	0.4	\$ 275.00	\$ 110.00
7/11/2023	Email with client re: dismissal of Plaintiff's claims and sanctioning of P&G from future filing of lawsuit	BCN	0.3	\$ 380.00	\$ 114.00
TOTAL			52.0		\$ 19,088.00